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*Attorneys for Defendants, Township of Edison, i/p/a City of Edison and Edison Police Department*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CARLTON R. BRATHWAITE,

Plaintiff,

vs.

MATTHEW TALAVERA, ET ALS.,

Defendant(s).

Civil Action No:

2:24-CV-08910-BRM-JRA

**STIPULATION WITHDRAWING MOTION  
FOR DEFAULT, MOTION TO VACATE  
AND EXTENDING TIME TO FILE AN  
ANSWER**

*(Document Electronically Filed)*

It is hereby stipulated and agreed by and between counsel for Plaintiff, Carlton R. Brathwaite, and counsel for Defendants, Township of Edison, i/p/a City of Edison, Edison Police Department, and Matthew Talavera, that:

1. Plaintiff's motion for default filed on November 8, 2024, against the Defendants is hereby withdrawn;
2. Defendants' cross-motion to vacate default filed on November 18, 2024 is hereby withdrawn;
3. The Clerk's entry of default against the Defendants is vacated; and

4. Defendants time to serve and file an Answer or otherwise respond to the Complaint in this matter is extended to fifteen (15) days from the date of execution of this stipulation.

**T.A. BLAKBURN LAW, PLLC**  
Attorney for Plaintiff,  
Carlton R. Brathwaite

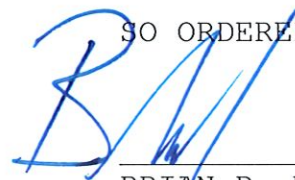
**RAINONE COUGHLIN MINCHELLO, LLC**  
Attorney's for Defendants  
Township of Edison, i/p/a City  
of Edison, Edison Police  
Department

By: /s/ Tyrone A. Blackburn  
Tyrone A. Blackburn, Esq.  
Dated: 4/4/25

By: /s/ Matthew R. Tavares  
Matthew R. Tavares, Esq.  
Dated: 4/4/25

**DVORAK & ASSOCIATES, LLC**  
Attorney for Defendant,  
Matthew Talavera

By: /s/ Lori A. Dvorak  
Lori A. Dvorak, Esq.  
Dated: 4/4/25

SO ORDERED:  


BRIAN R. MARTINOTTI, USDJ  
DATED: APRIL 8, 2025